

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**FRANKLIN CONSTRUCTION GROUP, LLC,)
)
Plaintiff,)
v.)
WILLIAM SHORE, JWSC, LLC, KEITH)
MEADOWS, JOSEPH HEATH, HYDS INC.,)
DEAN BINGHAM, LUNDON JOHNSON,)
TYLER WEBER, JOEL CHEVRETTE,)
DANNY KNOWLES, SCOTT MATTHEWS,)
and LOWE'S HOME CENTERS, INC.,)
)
Defendants.)**

Case No. 3:24-cv-01255

**JOINT MOTION FOR BRIEFING SCHEDULE AND TO RESCHEDULE INITIAL
CASE MANAGEMENT CONFERENCE**

The undersigned parties jointly move for entry of a briefing schedule to address pending motions to dismiss on behalf of multiple defendants (Docs. 66-71, 74-79). For cause, the parties show that there are several motions to dismiss raising complex questions of law, rendering the extension necessary to adequately address all arguments. After consultation, the parties propose the following schedule:

Responses in opposition to motions to dismiss: March 3, 2025

Replies in support of motions to dismiss: March 24, 2025

In addition, the parties jointly request that the initial case management conference, currently set for February 3, 2025 (Doc. 37), be reset to a date convenient for the Court following completion of briefing on the pending motions to dismiss.

Respectfully submitted,

Sherrard Roe Voigt & Harbison, PLC

/s/ Todd E. Panther w/ permission by Scott D. Carey

Christopher C. Sabis

Todd E. Panther

Thomas Hall

Sherrard Roe Voigt & Harbison, PLC

1600 West End Avenue, Suite 1750

Nashville, TN 37203

615-850-6822

Email: csabis@srvhlaw.com

Email: thall@srvhlaw.com

Email: tpanther@srvhlaw.com

Attorneys for Franklin Construction Group, LLC

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

/s/ Scott D. Carey

Gary C. Shockley (BPR 010104)

Scott D. Carey (BPR 015406)

Ryan P. Loofbourrow (BPR 033414)

1600 West End Avenue, Suite 2000

Nashville, Tennessee 37203

(615) 726-5704 (phone)

(615) 744-5704 (fax)

gshockley@bakerdonelson.com

scarey@bakerdonelson.com

rloofbourrow@bakerdonelson.com

Attorneys for Defendant Lowe's Home Centers, Inc.

/s/ Nadine Alsaadi w/ perm. by Scott D. Carey

Don L. Hearn, Jr.

Glankler Brown, PLLC

6000 Poplar Avenue, Suite 400

Memphis, TN 38119

(901) 576-1767 (phone)

(901) 525-2389 (fax)

dhearn@glankler.com

Nadine Alsaadi
Nicholas P. Roxborough
Joseph C. Gjonola
Roxborough Pomerance Nye & Adreani, LLP
5900 Canoga Ave., Ste 450
Woodland Hills, CA 91367
na@rpnalaw.com
npr@rpnalaw.com
jcg@rpnalaw.com

Attorneys for Joseph Heath.

/s/ Seth M. Hyatt w/ perm. by Scott D. Carey
Jerry E. Martin
Matthew Edward McGraw
Seth Marcus Hyatt
Barret Johnston Martin & Garrison, LLC
200 31st Avenue North
Nashville, TN 37203
jmartin@barrettjohnston.com
mmcgraw@barrettjohnston.com
shyatt@barrettjohnston.com

Attorneys for Keith Meadows and HYDS, Inc.

/s/ R. Brandon Bundron w/ perm. by Scott D. Carey
R. Brandon Bundron
Bradley Arant
1221 Broadway, Ste 2400
Nashville, TN 37203
snokes@bradley.com
bbundren@bradley.com

Attorneys for Dean Bingham

/s/ Robert J. Uhorchuk w/ perm. by Scott D. Carey
Darrick Lee O'Dell
Spicer Rudstrom, PLLC
220 Athens Way, Ste 450
Nashville, TN 37228
dodell@spicerfirm.com

Robert J. Uhorchuk
Nicholas C. Stevens
Spicer Rudstrom, PLLC
537 Market Street, Ste 203
Chattanooga, TN 37402
rju@spicerfirm.com
nstevens@spicerfirm.com

*Attorneys for Lundon Johnson, Joel Chevette, and
Danny Knowles*

CERTIFICATE OF SERVICE

I hereby certify under Rule 5 of the Federal Rules of Civil Procedure that a true and exact copy of the foregoing *Motion* was served on the following counsel of record via operation of the Court's electronic filing system:

Todd E. Panther
Christopher C. Sabis
Thomas B. Hall
SHERRARD ROE VOIGT & HARBISON, PLC
1600 West End Avenue, Suite 1750
Nashville, TN 37203
(615) 742-4200 - telephone
(615) 742-4539 - fax
tpanther@srvhlaw.com
csabis@srvhlaw.com
thall@srvhlaw.com
Attorneys for Franklin Construction Group, LLC

Don L. Hearn, Jr.
Glankler Brown, PLLC
6000 Poplar Ave., Ste 400
Memphis, TN 38119
dhearn@glankler.com

Nadine Alsaadi
Nicholas P. Roxborough
Joseph C. Gjonola
Roxborough Pomerance Nye & Adreani, LLP
5900 Canoga Ave., Ste 450
Woodland Hills, CA 91367
na@rpnalaw.com
npr@rpnalaw.com
jcg@rpnalaw.com

Attorneys for Joseph Heath

Jerry E. Martin
Matthew Edward McGraw
Seth Marcus Hyatt
Barret Johnston Martin & Garrison, LLC
200 31st Avenue North

Nashville, TN 37203
jmartin@barrettjohnston.com
mmcgraw@barrettjohnston.com
shyatt@barrettjohnston.com
Attorneys for Keith Meadows and HYDS, Inc.

Scarlett Singleton Nokes
R. Brandon Bundron
Bradley Arant
1221 Broadway, Ste 2400
Nashville, TN 37203
snokes@bradley.com
bbundren@bradley.com
Attorneys for Dean Bingham

Darrick Lee O'Dell
Spicer Rudstrom, PLLC
220 Athens Way, Ste 450
Nashville, TN 37228
dodell@spicerfirm.com

Robert J. Uhorchuk
Nicholas C. Stevens
Spicer Rudstrom, PLLC
537 Market Street, Ste 203
Chattanooga, TN 37402
rju@spicerfirm.com
nstevens@spicerfirm.com
Attorneys for Lundon Johnson, Joel Chevrette, and Danny Knowles

Dated January 24, 2025.

/s/ Scott D. Carey

Scott D. Carey